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**VIA ECF**

William T. Walsh, Clerk of Court  
United States District Court – District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, N.J. 07102

**Re: *Proton-Pump Inhibitor Products Liability Litigation (No. II)***  
**2:17-md-2789 (CCC)(MF) (MDL 2789)**

**This Document Relates to:**

***Bales v. AstraZeneca Pharmaceuticals LP*, No. 2:17-cv-06124**  
**[ECF No. 81]**

***Foster v. AstraZeneca Pharmaceuticals LP*, No. 2:17-cv-02475**  
**[ECF No. 66]**

***Lee v. AstraZeneca Pharmaceuticals LP*, No. 2:17-cv-00212**  
**[ECF No. 59]**

***Nelson v. AstraZeneca Pharmaceuticals LP*, No. 2:17-cv-13727**  
**[ECF No. 35]**

***Kersch v. AstraZeneca LP*, No. 2:18-cv-03159**  
**[ECF No. 52]**

***Rieder v. AstraZeneca Pharmaceuticals LP*, No. 2:19-cv-00850**  
**[ECF No. 37]**

This firm represents Defendants AstraZeneca Pharmaceuticals LP, AstraZeneca LP, and Merck Sharp & Dohme Corporation (“Defendants”). On October 15, 2021, Defendants filed a Motion to Exclude Opinion Testimony from Plaintiffs’ General Causation Experts under Federal Rule of Evidence 702 in the above-referenced matters and document numbers containing confidential information. During electronic filing, the CM/ECF system did not permit Defendants to file the motions under temporary seal. Accordingly, Defendants respectfully request the Clerk’s Office place the following filings under temporary seal pending Defendants’ forthcoming Motion to Seal pursuant to Local Civil Rule 5.3.

We thank the Court for its attention to this matter.

Respectfully submitted,

**/s/ Gregory J. Hindy**

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